EPA Reg. Jacket 92068-3

PROCESSING REQUEST

Reg # 92068-3 **Decision #** 525688

Description: New Product

Electronic Label & Letter (see PPLS):	OR	**Non Electronic Label & Letter** (Scanning required):
☐ Dated:		☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: Basic 1/21/2017

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: A. Heffernan

Division: AD

Phone: 347-8602 **Date:**

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Antimicrobials Division (7510P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

NOTICE OF PESTICIDE:
_X_ Registration
___ Reregistration
(under FIFRA, as amended)

EPA Reg. Number:	Date of Issuance:
92068-3	7/5/17

Term of Issuance:
Conditional

Name of Pesticide Product:
MVX Antimicrobial Coat

Name and Address of Registrant (include ZIP Code):

Matthew Brooks
Miracle Titanium LLC
c/o Ag-Chem Consulting
12644 Chapel Rd
Clifton, VA 20124

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Antimicrobials Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Zeno Bain, Acting Product Manager 33
Regulatory Management Branch I
Antimicrobials Division (7510P)

Date: 7/5/17

Office of Pesticide Programs	

EPA Form 8570-6

2. You are required to comply with the data requirements described in the DCI Order identified below:

    a. Silver GDCI-072501-1129

    You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Reevaluation Team Leader (Team 36): http://www2.epa.gov/pesticide-contacts/contacts-office-pesticide-programs-antimicrobial-division

3. The data requirements for storage stability and corrosion characteristics (Guidelines 830.6317 and 830.6320) are not satisfied. A one year study is required to satisfy these data requirements. You have 18 months from the date of registration to provide these data.

4. Make the following label changes before you release the product for shipment:

    - Revise the EPA Registration Number to read, "EPA Reg. No. 92068-3."

5. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 01/21/2017

If you have any questions, you may contact Aline Heffernan at 703-347-8602 or via email at heffernan.aline@epa.gov.

Enclosure: Stamped Label

MVX Antimicrobial Coat

A professionally applied spray-on Preservative and Bacteriostatic Agent for commercial and residential sites

Active Ingredients:

Silver	0.10%
Other Ingredients	99.90%
Total	100.00%

ACCEPTED
Jul 05, 2017
Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 92068-3

KEEP OUT OF REACH OF CHILDREN

Manufactured by:
Miracle Titanium USA
218-2 Norimatsu Yahatanishi Ward
Kitakyashin City, Japan

EPA Registration No.:92068-G
EPA Establishment No.:

Net Content: **LOT No.**

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

MVX Antimicrobial Coating is applied only by professionals trained and certified in the Application System Using Specialized Custom Equipment

MVX Antimicrobial Coat is a spray on preservative and bacteriostatic agent which inhibits the growth of mold, mildew, fungus and bacteria that cause odor, discoloration, staining, deterioration or corrosion of the coated surfaces. MVX Antimicrobial Coat also prevents slime mold accumulation on treated surfaces. It is a two part system consisting of a bacteriacidal spray and a sealer to hold the active ingredient on the surface and provide residual protections.

This product is for nonfood contact surfaces only:
Walls
Wallboard
Floors
Counters
Hospital surgical tables
Ventilation and air conditioning equipment
Upholstered furniture, mattresses and pillows
Carpets

Application Method

Apply MVX Sealer Spray to the surface first and allow to dry 10 minutes. Then apply MVX Antimicrobial Coat solution on surface and allow surface to air dry. **Do not apply at temperatures or on surfaces greater than 170°F.** Bacteria present will be killed within 10 minutes.

No product treated with this product may make any public health claims relating to antimicrobial activity without first obtaining an EPA registration for the product which permits such claims. No claim is made that this product protects users of any products listed below against food borne or disease causing bacteria, viruses, germs or other disease causing organisms.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Keep container closed when not in use. Do not store near food or feed. Shake well before use. Protect from freezing. In case of spill or leak on floor or paved surfaces, soak up with sand, earth, or synthetic absorbent. Remove to chemical waste storage area until proper disposal can be made.

Pesticide Disposal: Pesticide wastes may be hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these waste cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 second after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, or presence of other materials or other influencing factors in the use of the product, which are beyond the control of Miracle Titanium USA or Seller. To the extent consistent with applicable law all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Miracle Titanium USA and Seller harmless for any claims relating to such factors.

This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Miracle Titanium USA, and Buyer and User assume the risk of any such use. To the extent consistent with applicable law Miracle Titanium USA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE. To the extent consistent with applicable law Miracle Titanium USA or seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF MIRACLE TITANIUM USA SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF MIRACLE TITANIUM USA OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Miracle Titanium USA and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and of Liability, which may not be modified except by written agreement signed by a duly authorized representative of Miracle Titanium USA.

Miracle Titanium USA
218-2 Norimatsu Yahatanishi Ward
Kitakyashin City, Japan

EPA Reg. No. 92068-G
EPA Est. No.

MVX Primary Sealer

Directions For Use:
MVX Primary should only be used in conjunction with MVX Antimicrobial Coat. This product should only be applied by professionals trained and certified in the Application System Using Specialized Custom Equipment for this product

Apply MVX Primary as a smooth coat over surface. Allow to dry 10 minutes then apply MVX Antimicrobial Coat. Do not apply at temperatures or on surfaces greater than 170°F.

Ingredients:

CAS No 1467083-02-8		0.8%
PEROXOTITANIC ACID $Ti_2O_5(OH)_2$		
WATER		99.2 %

Precautionary Statements:

Harmful if inhaled. Avoid breathing mist or vapor. Causes moderate eye irritation. Causes moderate skin irritation. Avoid contact with eyes, skin or clothing. Wear goggles when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash clothing before reuse. handling.

FIRST AID	
IF inhaled	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice
IF in eyes	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for further treatment advice.
IF on skin	• Take off contaminated clothing • Rinse skin immediately with gently of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the Poison Control Center at 1-800-222-1222.	

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

Storage: Keep container closed when not in use. Do not store near food or feed. Shake well before use. Do not store in high heat (i.e. temperatures greater than 170°F). Protect from freezing. In case of spill or leak on floor or paved surfaces, soak up with sand, earth, or synthetic absorbent. Remove to chemical waste storage area until proper disposal can be made.

Disposal: Dispose of in a landfill as nontoxic chemical waste. Contact your State Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 second after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Manufactured by
Miracle Titanium USA
218-2 Norimatsu Yahatanishi Ward
Kitakyashin City, Japan

Net Contents: XX gallons

Heffernan, Aline

From: Matthew Brooks <mwbrooks01@yahoo.com>
Sent: Wednesday, June 28, 2017 2:48 PM
To: Heffernan, Aline
Subject: Re: Predecisional Letter 92068-G

Thanks!

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

On Wednesday, June 28, 2017 2:45 PM, "Heffernan, Aline" <heffernan.aline@epa.gov> wrote:

Matt

I'm still reviewing the label but so far it looks good. I'll let you know if I find anything by Thursday. At first glance it does look good. All the changes that I asked you to make are there. Before I can say it's acceptable I need to talk with my PM and have him review it.

I'll let you know if I have any questions or comments by Thursday.

I'm going on vacation before and after the PRIA date, I am leaving on July 6 and July 12. So if you have any questions during that time about your product please contact Zeno Bain. He is the acting PM for team 33.

Thank you,

Aline

From: Matthew Brooks [mailto:mwbrooks01@yahoo.com]
Sent: Wednesday, June 28, 2017 2:34 PM
To: Heffernan, Aline <heffernan.aline@epa.gov>
Subject: Re: Predecisional Letter 92068-G

Hi Aline
I will be out of the office Friday and Monday so I just wanted to follow up that you have everything you need and the label is acceptable.
Sincerely
-Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

On Tuesday, June 27, 2017 8:43 AM, "Heffernan, Aline" <heffernan.aline@epa.gov> wrote:

Matt,

I had a chance to look over the label and I have a few comments.

Page 2: The sealer directions say to spray the sealer first then the pesticide, please make the directions consistent on the two labels.

The Application method, should th oduct be left to sit for eight hours while there is continuous residual activity? Or can the protected product be used during that time?

Page 5: There is no dermal warning in the precautionary statements. In the original label for the sealer there was a warning about dermal irritation. Please include the precautionary statement for skin irritation.

Page 6: Remove the word Pesticide from the "Pesticide Storage" section. Also please include do not store in high heat environments.
In the "Pesticide Disposal" section the sealer is technically not a pesticide, this section should be edited to remove the words and phrases that are associated with pesticide disposal. This section should include how to properly dispose of the sealer. If you want you can delete the two first sentences in this section and leave the rest.

Thank you,

Aline

From: Matthew Brooks [mailto:mwbrooks01@yahoo.com]
Sent: Monday, June 26, 2017 9:16 PM
To: Heffernan, Aline <heffernan.aline@epa.gov>
Cc: Hebert, John <Hebert.John@epa.gov>; Bain, Zeno <Bain.Zeno@epa.gov>
Subject: Re: Predecisional Letter 92068-G

Hi Aline
I've attached word versions of the corrected product and copack label and a PDF of the CSF for the copack and a combined label.
Let me know what else needs to be done and I'll work on it today (Tuesday).
Sincerely
Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

On Monday, June 26, 2017 5:43 PM, "Heffernan, Aline" <heffernan.aline@epa.gov> wrote:

Matt,

Please see attached letter and labels. Because the sealer and the product are sold together, the sealer's label should be part of the master label. We also need a CSF for the sealer for the record as well.

Please let me know that you have received the letter and any questions or comments that you may have.

Thank you,

Aline Heffernan
Regulatory Management Branch 1
Antimicrobials Division
Office of Pesticide Programs
703-347-8602

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Matthew Brooks
Regulatory Consultant
Miracle Titanium LLC
c/o Ag-Chem Consulting
12644 Chapel Rd.
Clifton, VA 20124

Subject: Pre-Decisional Determination
Product Name: MVX Antimicrobial Coat
EPA Registration Number: 92068-G
Application Date: 01/19/2017
Decision Number: 525688

Dear Dr. Brooks:

The Agency has completed its review and assessment of your application pursuant to Section 33(b)(3) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended by the Pesticide Registration Improvement Extension Act of 2012. The Agency has made a pre-decisional determination that your application cannot be approved unless revisions are made to the label. The necessary label changes are specified on the attached label.

Since there is limited time before the PRIA Decision Due Date expires, it is important to discuss any objections you have to these changes immediately and whether you will need to submit additional data for review. If these discussions determine that submitting data will be necessary, the PRIA decision due date may need to be renegotiated to allow sufficient time to address and resolve such differences. If the PRIA Decision Due Date is not renegotiated, and the label issues are not resolved before the PRIA Decision Due Date, the Agency will send a follow-up letter that will represent the Agency's decision to close out the PRIA decision review time. The follow-up letter will provide the following three options for continuing the review of the application:

(a) Applicant agrees to all of the terms associated with the draft accepted label as revised by the Agency and requests that it be issued as the accepted final Agency-stamped label; or
(b) Applicant does not agree to one or more of the terms of the draft accepted label as revised by the Agency and requests additional time to resolve the difference(s); or
(c) Applicant withdraws the application without prejudice for subsequent resubmission, but forfeits the associated registration service fee.

If the applicant informs EPA that it has concerns as described under (b) above, the applicant will have up to 30 calendar days from the date of that follow-up letter to reach agreement with the Agency on the final version of the label that the Agency will accept. If an agreement cannot be reached within those 30 days, EPA would intend to proceed with denial of the application.

If the applicant agrees to all of the terms of the accepted label as described in (a) above, or if the applicant and EPA resolve any differences as described in (b), the applicant must submit a revised label to EPA. EPA will then provide an accepted final Agency stamped label to the applicant within 2 business days following the applicant's written electronic confirmation of agreement to the Agency including the revised label to be stamped.

If you have any questions, you may contact Aline Heffernan at 703-347-8602 or via email at heffernan.aline@epa.gov.

Sincerely,

Zeno Bain, Acting Product Manager 33
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

Attachments: Annotated Labels

MVX Antimicrobial Coat

A professionally applied spray-on Preservative and Bacteriostatic Agent for commercial and residential sites

Active Ingredients:

Silver	0.10%
Other Ingredients	99.90%
Total	100.00%

KEEP OUT OF REACH OF CHILDREN

Manufactured by:
Miracle Titanium USA
218-2 Norimatsu Yahatanishi Ward
Kitakyashin City, Japan

EPA Registration No.:92068-G
EPA Establishment No.:

Net Content:

LOT No.:

June 26, 2017

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

MVX Antimicrobial Coating is applied only by professionals trained and certified in the Application System Using Specialized Custom Equipment

MVX Antimicrobial Coat is a spray on preservative and bacteriostatic agent which inhibits the growth of mold, mildew, fungus and bacteria that cause odor, discoloration, staining, deterioration or corrosion of the coated surfaces. MVX Antimicrobial Coat also prevents slime mold accumulation on treated surfaces. It is a two part system consisting of a bacteriacidal spray and a non pesticidal sealer to hold the active ingredient on the surface and provide residual protections.

Commented [HA1]: Because there is a question the sealer can become an active ingredient when exposed to heat please remove this qualifier

This product is for nonfood contact surfaces only:
Walls
Wallboard
Floors
Counters
Hospital surgical tables
Glazing for cement tile
Ventilation and air conditioning equipment
Upholstered furniture, mattresses and pillows
Carpets

Commented [HA2]: This use site should be removed, when a tile is glazed it is exposed to high heat

Application Method

Spray MVX Antimicrobial Coat solution on surface and allow surface to air dry.
Bacteria present will be killed within 10 minutes.
Product has continuous residual activity over 8 hours.

Commented [HA3]: Please add "Do not apply at temperatures or on surfaces greater than 170 F".

No product treated with this product may make any public health claims relating to antimicrobial activity without first obtaining an EPA registration for the product which permits such claims. No claim is made that this product protects users of any products listed below against food borne or disease causing bacteria, viruses, germs or other disease causing organisms.

June 26, 2017

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Keep container closed when not in use. Do not store near food or feed. Shake well before use. Protect from freezing. In case of spill or leak on floor or paved surfaces, soak up with sand, earth, or synthetic absorbent. Remove to chemical waste storage area until proper disposal can be made.

Pesticide Disposal: Pesticide wastes may be hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these waste cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 second after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

June 26, 2017

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, or presence of other materials or other influencing factors in the use of the product, which are beyond the control of Miracle Titanium USA or Seller. To the extent consistent with applicable law all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Miracle Titanium USA and Seller harmless for any claims relating to such factors.

This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Miracle Titanium USA, and Buyer and User assume the risk of any such use. To the extent consistent with applicable law Miracle Titanium USA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE. To the extent consistent with applicable law Miracle Titanium USA or seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF MIRACLE TITANIUM USA SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF MIRACLE TITANIUM USA OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Miracle Titanium USA and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and of Liability, which may not be modified except by written agreement signed by a duly authorized representative of Miracle Titanium USA.

Miracle Titanium USA
218-2 Norimatsu Yahatanishi Ward
Kitakyashin City, Japan

EPA Reg. No. 92068-G
EPA Est. No. XXXXX-XX-XXX

Commented [HA4]: The label for the sealer needs to be part of the master label. Additionally, please submit the CSF for the sealer as well.

June 26, 2017

MVX Primary

Directions For Use:
MVX Primary should only be used in conjunction with MVX Antimicrobial Coat.
This product should only is applied only by professionals trained and certified in the Application System Using Specialized Custom Equipment for this product

Apply MVX Primary as a smooth coat over surface. Allow to dry 10 minutes then apply MVX Antimicrobial Coat. Do not apply at temperatures or on surfaces greater than 170°F.

Ingredients:

CAS No 1467083-02-8		0.8%
PEROXOTITANIC ACID $Ti_2O_5(OH)_2$		
WATER		99.2 %

Precautionary Statements:

EXPECTED TO BE A LOW HAZARD FOR RECOMMENDED HANDLING
Avoid prolonged or repeated breathing of mist or vapour. Avoid contact with eyes and prolonged or repeated contact with skin. Ensure adequate ventilation. Wash thoroughly after handling.
FIRST AID: Treat symptomatically. Get medical attention if symptoms occur. Keep out of reach of children. For additional information, see Material Safety Data Sheet (MSDS) for this material.
Since emptied containers retain product residue, follow label warnings even after container is emptied.
STORAGE AND DISPOSAL
PROHIBITIONS: Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container. Do not store under conditions, which might adversely affect the container or its ability to function properly. Such conditions include, but are not limited to, positioning of the container in storage, storage temperature, potential for crushing or damage due to stacking, and penetration of moisture.
STORAGE: Store in safe manner. Store in original container only. Store in cool, dry place. Keep container tightly closed when not in use.
DISPOSAL: Discharge, treatment, or disposal is subject to national, state, provincial, or municipal laws.

Manufactured by
Miracle Titanium USA
218-2 Norimatsu Yahatanishi Ward
Kitakyashin City, Japan

Net Contents: XX gallons

Commented [HA1]: Please include this label in the master label.

Commented [HA2]: This should be "be" not is

Commented [HA3]: This implys safety, please remove this heading

Commented [HA4]: Please use the language according to the label review manual.
Category 3 for inhalation: Harmful if inhaled. Avoid breathing mist or vapour. Remove and wash contaminated clothing before reuse.
Category 3 for eye irritation: Causes Moderate eye irritation. Avoid contact with eyes or clothing. Wear goggles. Wash thourughly with soap and water after handeling and before eating, drinking, chewing gum, using tobacco or using the toilet.
Category 3 for dermal irriation: Avoid contact with skin or clothing.

Commented [HA5]: Please add the first aid for eyes, dermal and inhaltion to the label. Please use the standard language from the label review manual.

If inhaled:
– Move person to fresh air.
– If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
– Call a poison control center or doctor for further treatment advice.
If in eyes:
– Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
– Call a poison control center or doctor for treatment advice
If on skin:
– Take off contaminated clothing.
– Rinse skin immediately with plenty of water for 15-20 minutes.
– Call a poison control center or doctor for treatment advice.

Commented [HA6]: Please make the storage and disposal the same or similar to MVX Antimicrobial Coat

Heffernan, Aline

From: Matthew Brooks <mwbrooks01@yahoo.com>
Sent: Monday, June 26, 2017 1:56 PM
To: Heffernan, Aline
Subject: Re: New Registration for 92068-G
Attachments: 92068-G MVX Label no warnings june2017.docx

Hi Aline
Based on your comment, is the attached acceptable?
-Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

On Friday, June 23, 2017 9:12 AM, "Heffernan, Aline" <heffernan.aline@epa.gov> wrote:

Matt,

I've taken a look at the label that you sent and it looks good to me, but I will let you know if any questions or comments about the label come up. Attached are the product chemistry and the acute toxicology reviews. According to the acute toxicology review, the product is category 4 for all tox categories so any precautionary language is optional. However, since we do not have any prescribed precautionary language for tox category 4, the language for tox category 3 can be used. If you would like to change the label to reflect the acute toxicology review please send me a note and/or the label by COB Monday.

Please let me know if you have any questions or comments.

Thank you,
Aline

From: Matthew Brooks [mailto:mwbrooks01@yahoo.com]
Sent: Friday, June 16, 2017 12:54 PM
To: Heffernan, Aline <heffernan.aline@epa.gov>
Subject: Re: New Registration for 92068-G

Hi Aline
Attached are revised labels. I added the statement not to apply at temperatures or on surfaces greater than 170oF. I also removed the glazing application. I didn't see the pizza oven.
-Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

On Friday, June 16, 2017 10:23 AM, "Heffernan, Aline" <heffernan.aline@epa.gov> wrote:

Matt,

If the sealer is included you would have to put some controls on the product explaining it should not be exposed to high heat or on use site that are exposed to high heat. For example, one of the use sites is glazing for cement tiles. If the glaze is exposed to temperatures over 170 F then this use site should be removed. Or if the tile after it has been glazed is used in a pizza oven, it would also be exposed to high heat and should not be used because it could release the nano titanium.

If you add the sealer later this information, restricting exposure from high heat, would still need to be on the label. Unless you submitted data showing at higher temperatures nano titanium is not released and the sealer is not acting as an active ingredient.

Thank you,
Aline

From: Matt Brooks [mailto:mwbrooks01@yahoo.com]
Sent: Friday, June 16, 2017 10:05 AM
To: Heffernan, Aline <heffernan.aline@epa.gov>
Cc: Bain, Zeno <Bain.Zeno@epa.gov>; Murasaki, Seiichi <Murasaki.Seiichi@epa.gov>; Hebert, John <Hebert.John@epa.gov>
Subject: Re: New Registration for 92068-G

We would not increase the rate just frequency
I'd rather keep the sealer but if it will hold up the registration I'll pull it for now and file an amendment later to add it

Sent from my iPhone

On Jun 16, 2017, at 9:31 AM, Heffernan, Aline <heffernan.aline@epa.gov> wrote:

> Matt,
>
> I think the best way forward would be to remove the sealer from the label to move forward with the registration. As long as the dosage rates do not change this should be a good way to move forward.
>
> If the dosage rates do increase, please cite a similar label that has these increased rates.
>
> If the sealer stays on the label there would need to be use directions preventing the use of the product at high temperatures and use sites that are exposed high heat, over 170 F. We would need to review this language to make sure that the product will not release any nano titanium.
>
> Thanks,
> Aline
>
> **From:** Matthew Brooks [mailto:mwbrooks01@yahoo.com]
> **Sent:** Friday, June 16, 2017 8:37 AM
> **To:** Heffernan, Aline <heffernan.aline@epa.gov>
> **Cc:** Bain, Zeno <Bain.Zeno@epa.gov>; Murasaki, Seiichi <Murasaki.Seiichi@epa.gov>
> **Subject:** Re: New Registration for 92068-G
>
> Hi Aline
> The client informed me that the reaction you described can only occur if the application temperature is greater than 170 degrees (which it is not, application is always at room temperature) and can't occur at all once the product dries.
> -Matt Brooks
>
> Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com
>
> On Thursday, June 15, 2017 11:44 AM, "Heffernan, Aline" <heffernan.aline@epa.gov> wrote:

Matt,

I've looked into the ingredient in the sealer and there is significant concern that the ingredient is a nano active ingredient. According to one of the Agency's chemists, the peroxotitanic acid produces titanium dioxide in the form of anatase crystals. These crystals are nano sized. We have concern that the titanium dioxide is also acting as an active ingredient. So I have a few questions about the ingredient.

Will the product still work without the sealer?
Can you provide evidence the ingredient is not an active ingredient?
Can you provide us more information on what the inert ingredients are in the sealer?

Thank you,
Aline

From: Matthew Brooks [mailto:mwbrooks01@yahoo.com]
Sent: Thursday, June 01, 2017 6:25 PM
To: Heffernan, Aline <heffernan.aline@epa.gov>
Subject: Re: New Registration for 92068-G

Hi Aline
Here's a brief proposed label for the copack.
-Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

On Tuesday, May 30, 2017 5:23 PM, "Heffernan, Aline" <heffernan.aline@epa.gov> wrote:

Matt,

I've attached a copy of the label and I've annotated it with comments. I have a few questions and marked a few typos.

Since the product is sold with the non pesticidal sealer can you please send me a copy of that label.

In the Application Method it says the bacteria present will be killed within 10 minutes and the residual bacteria will be reduced in 8 hours. Can you please specify this would be non-public health bacteria? And does the product need to remain wet for the 8 hours to be effective?

Please let me know if you have any questions or comments.

Thank you,

Aline

From: Matthew Brooks [mailto:mwbrooks01@yahoo.com]
Sent: Tuesday, May 30, 2017 3:07 PM
To: Heffernan, Aline <heffernan.aline@epa.gov>
Subject: Re: New Registration for 92068-G

Hi Aline
I've attached a Word version of the label.
I've answered your questions below IN CAPS.
I am still working on clarifying the biofilm.

I hope you are doing well. I am the reviewer that is assigned to your new registration for 92068-G. The reviews are still in progress but I need an electronic copy of the label. Can you please send it to me.

I also have some concern with the name of the product. "Miracle Titanium MVX" is not appropriate for the product. The product does not contain titanium and the word miracle implies superior efficacy and safety. Please change the name of the product to something more appropriate for a pesticide.
WE CHANGED THE NAME TO MVX ANTIMICROBIAL COAT

I also have a few questions about the label that was submitted. In the directions for use can you please specify nonpublic biofilm in the claims. Can this also be added to the label: "No product treated with the product may make any public health claims relating to antimicrobial activity without first obtaining an EPA registration for the product which permits such claims. No claim is made that the product protects users of any products listed below against food borne or disease causing bacteria, viruses, germs or other disease causing organisms."..
WORKING ON BIO FILM. LANGUAGE ADDED TO LABEL

I'm also a little confused on the timing of the incorporation of the product and who is going to be applying it. Is the spray then the sealer sold for residential use? Is the product applied before the product is sold or after it is solD.
PRODUCT IS ONLY APPLIED BY PERSONNEL TRAINED IN ITS APPLICATION. IT WILL NOT BE SOLD DIRECTLY TO CONSUMERS.

Can you also let me know what is in the sealer? Are the two products sold together in the same package? If the two items are sold together please send me the sealer label as well.
SEALER SOLUTION

CAS No 1467083-02-8		0.8%
PEROXOTITANIC ACID $Ti_2O_5 (OH)_2$		
WATER		99.2 %

THE TWO PRODUCTS ARE SOLD TOGETHER.

In the Condition of Sale and Limitation of Warranty and Liability section I have a few questions/comments. In the second paragraph there is a section about crop injury. This product is for non-food contact, it should not be applied to crops. Can you please edit this section? I'm also a little confused by the third paragraph. It seems to imply that the product might not work as directed can this section also be edited for clarity?
THIS WAS FROM ANOTHER LABEL- I EDITED IT AS YOU REQUESTED- HOPEFULLY IT MAKES SENSE NOW.

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

On Thursday, May 25, 2017 3:47 PM, "Heffernan, Aline" <heffernan.aline@epa.gov> wrote:

Dr. Brooks,

I hope you are doing well. I am the reviewer that is assigned to your new registration for 92068-G. The reviews are still in progress but I need an electronic copy of the label. Can you please send it to me.

I also have some concern with the name of the product. "Miracle Titanium MVX" is not appropriate for the product. The product does not contain titanium and the word miracle implies superior efficacy and safety. Please change the name of the product to something more appropriate for a pesticide.

I also have a few questions about the label that was submitted. In the directions for use can you please specify nonpublic biofilm in the claims. Can this also be added to the label: "No product

treated with the product may make any public health claims relating to antimicrobial activity without first obtaining an EPA registration for the product which permits such claims. No claim is made that the product protects users of any products listed below against food borne or disease causing bacteria, viruses, germs or other disease causing organisms.".

I'm also a little confused on the timing of the incorporation of the product and who is going to be applying it. Is the spray then the sealer sold for residential use? Is the product applied before the product is sold or after it is sold?

Can you also let me know what is in the sealer? Are the two products sold together in the same package? If the two items are sold together please send me the sealer label as well.

In the Condition of Sale and Limitation of Warranty and Liability section I have a few questions/comments. In the second paragraph there is a section about crop injury. This product is for non-food contact, it should not be applied to crops. Can you please edit this section? I'm also a little confused by the third paragraph. It seems to imply that the product might not work as directed can this section also be edited for clarity?

Please let me know if you have any questions.

Thank you,

Aline Heffernan
Regulatory Management Branch 1
Antimicrobials Division
Office of Pesticide Programs
703-347-8602

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

EPA United States Environmental Protection Agency **Office of Pesticide Programs**

MEMORANDUM

6/22/2017

SUBJECT: Acute Toxicity Review for Miracle Titanium MVX, EPA File Symbol 92068-G
DP 438077

FROM: Wallace Powell
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

THRU: Jenny Tao, Senior Scientist
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

TO: Zeno Bain, PM Team 33 / Aline Heffernan
Regulatory Management Branch I
Antimicrobials Division (7510P)

Registrant: Miracle Titanium LLC		
Decision No.: 525688	Submission No.: 997865	E-Sub No.: None
DP No.: 438077	Action Code: A540	
MRIDs of Submitted studies: 49965203 through 49965208		

PC code*	Active Ingredient*	% weight
221700	Silver from silver zeolite	0.10
	Other Ingredients	99.90
	Total	100.00

*Based on 6/8/2017 product chemistry review, DP 438119

BACKGROUND

In support of registration for the proposed product *Miracle Titanium MVX*, EPA File Symbol 92068-G, the applicant has submitted studies for acute oral toxicity, acute dermal toxicity, acute inhalation toxicity, eye irritation, skin irritation, and skin sensitization. *Miracle Titanium MVX* is a liquid product for protection of various non-food contact surfaces, porous and non-porous.

RELEVANT DOCUMENTS

	RECEIVED OR CITED	N/A
EPA FORM 8570-35 – Data Matrix	☒	☐
Cover letter	☒	☐
Transmittal document	☒	☐
Basic CSF	☒	☐
Proposed label	☒	☐
Acute Oral Toxicity Study (OSCPP 870.1100)	☒	☐
Acute Dermal Toxicity Study (OSCPP 870.1200)	☒	☐
Acute Inhalation Toxicity Study (OSCPP 870.1300)	☒	☐
Primary Eye Irritation Study (OSCPP 870.2400)	☒	☐
Primary Skin Irritation Study (OSCPP 870.2500)	☒	☐
Skin Sensitization Study (OSCPP 870.2600)	☒	☐

RECOMMENDATION

Five of the six submitted studies are Acceptable. The submitted skin irritation study is classified as Supplemental. A review of each of the six studies is attached to this memorandum. The study MRIDs and the assigned Toxicity Categories are listed in the table below.

Test substance

The applicant's 1/16/2017 letter (MRID 50159200) explains that a previous application for registration of *Miracle Titanium MVX* was withdrawn over concerns that a certain ingredient may be functioning as an active ingredient. Because of the nature of that ingredient and the fact that it composed a very small portion of the total formulation, the applicant is of the opinion that this minor revision in formulation would not alter the basic study findings. Thus, the applicant thinks that the existing acute toxicity data need not be re-conducted. PSB agrees.

Skin irritation

The submitted skin irritation study is being classified as Supplemental. As such, it is unacceptable as a stand-alone study but offers information useful in the assignment of a regulatory Toxicity Category of IV when considered along with other submitted data.

Why the skin irritation study is being classified as Supplemental. The OCSPP (and the OECD) guidelines for skin irritation testing indicate that the test substance should be applied to a

small area of skin, approximately 6 cm^2. Whereas, in the submitted study (MRID 49965205), the test substance was applied over a much larger area, approximately 6 x 6 cm, i.e., about 36 cm^2. Thus, the study, in and of itself, is not acceptable.

Why Toxicity Category IV is still being assigned for skin irritation. The OCSPP *acute dermal toxicity* test guidelines state: "The test substance should be applied uniformly over a shaved or clipped area which is approximately 10 percent of the body surface area." Based on the weights of the rats in the submitted acute dermal toxicity study (MRID 49965207), it is estimated that the areas exposed in that study would be tend to be comparable (slightly less) than the areas exposed in the submitted skin irritation study. We note that the testing laboratory looked for skin irritation signs during the acute dermal toxicity study and found none. An acute dermal toxicity study tends to present a serious exposure when the item tested is a dermal irritant, and the testing of dermal irritants in such a study tends to result in signs of skin irritation. The fact that no such signs were found lends support for an assignment of Toxicity Category IV for *Miracle Titanium MVX* skin irritation. It is also worth noting that, in the submitted skin sensitization study (MRID 49965203), the concentration appropriately selected for topical induction and challenge for the test substance was 100%, i.e., undiluted. (Of course, the test animal species was different than that of the skin irritation study, but the point is still worth noting.) In consideration of these things and of the Toxicity Category outcome of the skin irritation study, it is reasonable to assign skin irritation Toxicity Category IV to *Miracle Titanium MVX* for regulatory purposes.

Summary

The acute toxicity profile for *Miracle Titanium MVX* (EPA File Symbol 92068-G) is currently:

Study	MRID	Toxicity Category	Status
Acute Oral Toxicity	49965204	IV	Acceptable
Acute Dermal Toxicity	49965207	IV	Acceptable
Acute Inhalation Toxicity	49965208	IV	Acceptable
Primary Eye Irritation	49965206	IV	Acceptable
Primary Skin Irritation	49965205	IV	Supplemental
Skin Sensitization	49965203	Non-sensitizer	Acceptable

Product Labeling

Based on the above acute toxicity profile, no specific First Aid or human-hazard precautionary statements (or headings) are required on the *Miracle Titanium MVX* label except the front-panel statement "Keep Out of Reach of Children" (KOROC). The Agency PM may, in accordance with 40 CFR §156.66, decide whether to waive the KOROC requirement, and whether to approve its placement on other than the front panel.

The presence of the signal word is optional. If one is used, it must be "CAUTION".

Note: The First Aid statements and human-hazard precautionary paragraph in the submitted labeling (dated "January 2, 2017") are acceptable but optional.

In the First Aid statements, one of the statements from the Agency's *Label Review Manual* – "Have person sip a glass of water if able to swallow" – is missing from the *If Swallowed* instructions. If the applicant considers the omission to be medically advisable, PSB has no objection.

DATA REVIEW FOR ACUTE ORAL TOXICITY TESTING (OCSPP 870.1100)

Product Manager: 33
MRID No.: 49965204

Reviewer: W. Powell
Study Completion Date: 11/6/2015
Report No.: 15_103_001

Testing Laboratory: sa-FORD (Sanctuary for Research and Development)
Author: Sneha Krishnamurthy

Quality Assurance (40 CFR §160): Included

Test Material: Miracle titanium MVX
Dose Level: 5000 mg/kg

Species: Rat, Wistar
Sex: 3 Females
Age: 8-11 weeks
Weight: 165-176 grams
Source: sa-FORD

Method: Up-and-Down Procedure. Limit test.

Summary:

1. **Estimated LD_{50}:** > 5000 mg/kg
2. **Toxicity Category:** IV
3. **Classification:** Acceptable

Deviations from Guideline 870.1100 and related comments: No deviations noted.

Results:

With administration of the test substance by oral gavage at a dose of 5000 mg per kg body weight to female rats in a stepwise manner, all three rats survived the 14-day observation period. Cage-side observations and gross necropsy revealed no notable findings. All three animals showed weekly weight gain.

Reported Mortality – Limit Test

Dosing Sequence	Dose Level (mg/kg)	Short-Term Outcome	Long-Term Outcome
1	5000	O	O
2	5000	O	O
3	5000	O	O

O = Survival

DATA REVIEW FOR ACUTE DERMAL TOXICITY TESTING (OCSPP 870.1200)

Product Manager: 33
MRID No.: 49965207

Reviewer: W. Powell
Study Completion Date: 12/21/2015
Report No.: 15_103_002

Testing Laboratory: sa-FORD (Sanctuary for Research and Development)
Author: Parag Pawar

Quality Assurance (40 CFR §160): Included

Test Material: Miracle titanium MVX
Dose Level: 5000 mg/kg

Species: Rat, Wistar
Sex: 5 Males and 5 Females
Age: 8-11 weeks
Weight: Males 245-256 grams, Females 235-251 grams
Source: sa-FORD

Summary:

1. **Estimated LD_{50}:** > 5000 mg/kg
2. **Toxicity Category:** IV
3. **Classification:** Acceptable

Deviations from Guideline 870.1200 and related comments: No deviations noted.

Results:

Dermal application of the test substance to male and female rats produced no mortality during the 14-day observation period. Cage-side observations and gross necropsy revealed no notable findings. All animals gained body weight during the observation period.

Reported Mortality

Dose Level (mg/kg)	Number Dead / Number Tested		
	Males	Females	Combined
5000	0 / 5	0 / 5	0 / 10

DATA REVIEW FOR ACUTE INHALATION TOXICITY TESTING (OCSPP 870.1300)

Product Manager: 33
MRID No.: 49965208

Reviewer: W. Powell
Study Completion Date: 11/25/2015
Report No.: 15_103_003

Testing Laboratory: sa-FORD (Sanctuary for Research and Development)
Author: Neelam Patel

Quality Assurance (40 CFR §160): Included

Test Material: Miracle titanium MVX
Concentrations: Gravimetric: 5.04 mg/L. Nominal: 104.57 mg/L
Chamber Type: Nose-only

Species: Rat, Wistar
Sex: 5 Males and 5 Females
Age: 8-10 weeks
Weight: Males 174-180 grams, Females 186-201 grams
Source: sa-FORD

Summary:

1. **Estimated LC_{50}:** > 5.04 mg/L
2. **Toxicity Category:** IV
3. **Classification:** Acceptable

Deviations from Guideline 870.1300 and related comments: No deviations noted.

Results:

Following a 4-hour exposure, no mortality occurred during the 14-day observation period. Cage-side observations and gross necropsy revealed no notable findings. All animals gained body weight during the observation period.

Reported Mortality

Exposure Concentration (mg/L)	Number of deaths / number tested		
	Males	Females	Combined
5.04	0 / 5	0 / 5	0 / 10

Chamber Atmosphere

Exposure Conc. (mg/L)	MMAD (µm)	GSD	% of Particles < 3.96 µm
5.04	3.84	2.95	51.11

Chamber Environment

Exposure Level (mg/L)	5.04
Chamber Volume (L)	22.52
Total Airflow Rate (at inlet) (Lpm)	8.00
Temperature (°C)	22.1 - 22.3
Relative Humidity (%)	58.1 - 58.9

DATA REVIEW FOR ACUTE EYE IRRITATION TESTING (OPPTS 870.2400)

Product Manager: 33
MRID No.: 49965206

Reviewer: W. Powell
Study Completion Date: 11/6/2015
Report No.: 15_103_006

Testing Laboratory: sa-FORD (Sanctuary for Research and Development)
Author: Chetan S. Ghogale

Quality Assurance (40 CFR §160): Included

Test Material: Miracle titanium MVX
Dosage: 0.1 mL

Species: Rabbit, New Zealand White
Sex: 3 Males
Age: Approx. 2.0 - 3.5 months
Weight: 1.624 - 1.792 kg
Source: LIVEON BIOLABS PVT. LTD.

Summary:

1. **Toxicity Category:** IV
2. **Classification:** Acceptable

Deviations from Guideline 870.2400 and related comments: No deviations noted.

Results:

Following the instillation of 0.1 mL undiluted test material into the conjunctival sac of the right eye of three rabbits, no corneal opacity, iritis, or "positive" conjunctival effects were observed during the 72-hour observation period. The left eye of each rabbit served as control. At 1 hour post-instillation, slight conjunctival redness (grade 1 on the Draize scale) was observed in the treated eye of all three rabbits.

Incidence of Irritation

Time Post-Instillation	No. of Animals Testing 'Positive' / No. of Animals Tested			
	Corneal Opacity	Iritis	Conjunctiva	
			Redness	Chemosis
1 hour	0 / 3	0 / 3	0 / 3	0 / 3
24 hours	0 / 3	0 / 3	0 / 3	0 / 3
48 hours	0 / 3	0 / 3	0 / 3	0 / 3
72 hours	0 / 3	0 / 3	0 / 3	0 / 3

DATA REVIEW FOR ACUTE DERMAL IRRITATION TESTING (OCSPP 870.2500)

Product Manager: 33
MRID No.: 49965205

Reviewer: W. Powell
Study Completion Date: 11/6/2015
Report No.: 15_103_005

Testing Laboratory: sa-FORD (Sanctuary for Research and Development)
Author: Chetan S. Ghogale

Quality Assurance (40 CFR §160): Included

Test Material: Miracle titanium MVX
Dosage: 0.5 mL

Species: Rabbit, New Zealand White
Sex: 3 Males
Age: Approx. 4.0 - 5.5 months
Weight: 1.921 - 2.312 kg
Source: Sanzyme

Summary:

1. **Toxicity Category:** IV
2. **Classification:** Supplemental

Deviations from Guideline 870.2500 and related comments:

The Guidelines indicate that the test substance should be applied to a small area of skin, approximately 6 cm^2. Whereas, in the submitted study, the test substance was applied over a much larger area, approximately 6 x 6 cm, i.e., 36 cm^2. Note: The reasons for classifying the study as Supplemental (rather than Unacceptable) are given in the Data Package memorandum.

Results:

The table below shows the erythema and edema results (individual Draize scores) following a four-hour dermal exposure in three rabbits.

No erythema or edema were observed at any treated site during the 72-hour observation period. No other signs of dermal irritation were noted.

Individual Skin Irritation Scores following the four-hour exposure

Animal No.	Sex	Erythema / Edema			
		Time After Patch Removal			
		1 hour	24 hrs	48 hrs	72 hrs
1	M	0 / 0	0 / 0	0 / 0	0 / 0
2	M	0 / 0	0 / 0	0 / 0	0 / 0
3	M	0 / 0	0 / 0	0 / 0	0 / 0

DATA REVIEW FOR DERMAL SENSITIZATION TESTING (OCSPP 870.2600)

Product Manager: 33
MRID No.: 49965203

Reviewer: W. Powell
Study Completion Date: 11/30/2015
Report No.: 15_103_004

Testing Laboratory: sa-FORD (Sanctuary for Research and Development)
Author: Neelam Patel

Quality Assurance (40 CFR §160): Included

Test Material:

Substance: Miracle titanium MVX
Applied 5.0% v/v in distilled water and 5.0% v/v in adjuvant mixture for intradermal induction;
Applied 100% for topical induction and challenge

Animals: Guinea pig, Dunkin Hartley
Treatment group: 10 males
Sham control: 5 males
Range finding: 3 males

Historical Positive Control:

Substance: Benzocaine (CAS No. 94-09-7) (100%)
Applied 5.0% v/v in propylene glycol and 5.0% v/v in adjuvant mixture for intradermal induction;
Applied in 80% ethanol for topical induction, and in acetone for challenge

Animals: Guinea pig, Dunkin Hartley
Treatment group: 10 males
Sham control: 5 males
Range finding: Not reported

Method: Guinea Pig Maximization Test (GPMT) of Magnusson and Kligman (OECD Guideline 406; OPPTS Guideline 870.2600, 1998 edition)

Summary:

1. *Miracle titanium MVX* did **not** appear to be a contact sensitizer.
2. **Classification:** Acceptable

Deviations from Guideline 870.2600 and related comments: No deviations noted.

Results:

The table below shows average erythema scores for the test material in the *Miracle titanium MVX* study. Moderate erythema was observed in all ten Test Group animals following intradermal induction. Faint erythema was observed in all ten Test Group animals following topical induction. No erythema (or edema) was found in any animal following challenge. No reaction was found in any of the five animals of the Sham Control group, following either induction or challenge. The study results indicate that Miracle titanium MVX was **not** a contact sensitizer.

Historical positive control study (Reliability study) results were appropriate. The study was conducted within six months of the *Miracle titanium MVX* study.

Table: Reactions to test material – average erythema scores

Application	Erythema[1]	
Intradermal Induction: Test Group	2.0	
Intradermal Induction: Sham Control Group	0.0	
Topical Induction: Test Group	1.0	
Topical Induction: Sham Control Group	0.0	
	24 Hrs[2]:	**48 Hrs[2]:**
Challenge: Test Group	0.0	0.0
Challenge: Sham Control Group	0.0	0.0

[1] ***Erythema***: Induction scores are according to Draize grading scale; Challenge scores are according to Magnusson & Kligman grading scale.

[2] ***Hrs***: Hours after patch removal

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

EPA United States Environmental Protection Agency **Office of Pesticide Programs**

MEMORANDUM

6/8/2017

SUBJECT: Product Chemistry Review for **Miracle Titanium MVX**
EPA Reg. No.: 92068-G, DP 438119

FROM: Salvador Rodriguez
Product Science Branch, CT Team
Antimicrobials Division (7510P)

THRU: Karen Hicks, Team Leader
Product Science Branch
Antimicrobials Division (7510P)

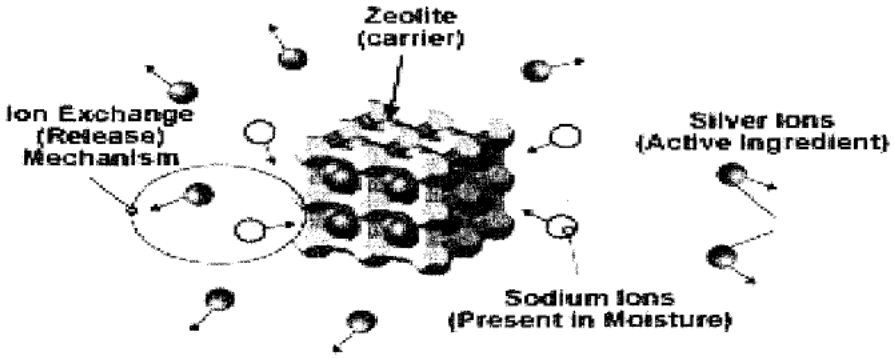
TO: John Hebert PM Team 31 / Aline Heffernan
Regulatory Management Branch I
Antimicrobials Division (7510P)

Registrant: Miracle Titanium LLC
Action code: A540

Agency Due Date: 7/10/2017
Science Due Date: 6/10/2017
Submission No.: 997865
E-Sub No.
Classification: EP
Process: Nonintegrated system
Pesticide classification: Antimicrobial

Group A MRID(s):50159201, Group B MRID(s): 50159201GUIDELINE(s): Series 830 Group A, Series 830 Group B

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
221700	130328-18-6	Silver from silver Zeolite	0.10
		Other Ingredients	99.9
		Total	100%



06/08/17

I. BACKGROUND

The Registrant, Miracle Titanium LLC, has submitted an application for pesticide registration for their product: **Miracle Titanium MVX** EPA Reg. No. 92068-G.

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-1 – Application for Pesticide Registration	☐	☐
EPA FORM 8570-27 – Formulator's Exemption Statement	☐	☐
EPA FORM 8570-34 – Certification with respect to citation of data	☒	☐
EPA FORM 8570-35 – Data Matrix (2/13/2017)	☒	☐
Cover letter (1/16/2017)	☒	☐
Transmittal document	☒	☐
Proposed CSF BASIC, (1/21/2017)	☒	☐
Proposed label, (1/2/2017)	☒	☐
Certification for Pilot Fragrance Notification Program	☐	☒
	☐	☐
REFERENCED: CSF: N/A	--	
Comments:		

III. FINDINGS<u>CONFIDENTIAL STATEMENT OF FORMULA</u>

a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	☐	☐	☒	☐	☒
Integrated	☐	☐	☐		

Active Ingredients(s)	Nominal	Upper limit	Lower limit
Silver from Silver from silver Zeolite	0.10	0.11	0.099

	Acceptable	**Not Acceptable**	**N/A**
1. The certified limits of all ingredients are within 40 CFR standard certified limits.	☒	☐	☐
2. The nominal concentration(s) of the active ingredient is in agreement with the label.	☒	☐	☐

3. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	☒	☐	☐
4. All inert ingredients are approved for non-food use pesticide formulations.	☒	☐	☐
5. The impurities present >0.1% are identified.	☐	☐	☒
6. Impurities of toxicological significance have an upper certified limit.	☐	☐	☒

b. Product Label:

	Yes	NO	N/A
The formula contains one of the following:			
1. 10% or more of petroleum distillate	☐	☒	☐
2. 1.0% or more of methyl alcohol	☐	☒	☐
3. Sodium nitrite at any level	☐	☒	☐
4. A toxic list 1 inert at any level	☐	☒	☐
5. Arsenic in any form	☐	☒	☐
6. If yes to 2-6, then the inert ingredient list contains a relevant footnote	☐	☐	☒
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	☒	☐	☐
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	☒	☐	☐
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	☐	☐	☒

IV. Additional Findings: None

V. Conclusion:

Product Science Branch of Antimicrobials Division finds the proposed CSF for the basic formulation, dated 01/21/17, and the OPPTS Guidelines Series 830 Groups "A & B", supporting the bactericide, end-use, non-integrated, non-food product **EPARN: 92068-G to** be acceptable.

VI. Table A:
Series 830 guidelines – Group A

OPPTS#	Name	Status	MRID
830.1550	Product Identity & Composition	Acceptable	50159201
830.1600	Description of materials	Acceptable	50159201
830.1620	Description of production process	Not required	N/A
830.1650	Description of formulation process	Acceptable	50159201
830.1670	Discussion of formation of impurities	Not required	N/A
830.1700	Preliminary analysis	Not required	N/A
830.1750	Certified limits	Acceptable	50159201
830.1800	Enforcement analytical method	Acceptable	49965201
830.1900	Submittal of samples	Not required	N/A

VII. Table B:
Series 830 guidelines – Group B

OPPTS#	Name	Study Findings/Comment	Status	MRID
830.6302	Color	Not required for end use product	Not applicable	N/A
830.6303	Physical state	Emulsified liquid	Acceptable	50159201
830.6304	Odor	Not required for end use product	Not applicable	N/A
830.6313	Stability to normal & elevated temperatures, metals & metal ions	The product is not TGAI	Not applicable	N/A
830.6314	Oxidation/Reduction	The product does contain an oxidizing agent or functional group of significant activity	Acceptable	50159201
830.6315	Flammability	Product is not potentially flammable	Acceptable	50159201
830.6316	Explodability	Product does not contain explosive ingredients	Acceptable	50159201
830.6317	Storage stability	The study is in progress	In progress	N/A
830.6319	Miscibility	Product not mixed with organic solvents	Acceptable	50159201
830.6320	Corrosion characteristics	The study is in progress	In progress	N/A

830.6321	Dielectric breakdown voltage	Product not used near electrical equipment	Acceptable	50159201
830.7000	pH	The pH of the product was reported to be 9.09 lbs. /ft^3 at 20° C. (see appendix 1)	Acceptable	50159201
830.7050	UV/Visible absorption	Not required for MUP or EP	Not applicable	N/A
830.7100	Viscosity	1.36m/Pa/s (see appendix 1)	Acceptable	50159201
830.7200	Melting point	Not required for MUP or EP	Not applicable	N/A
830.7220	Boiling point	Not required for MUP or EP	Not applicable	N/A
830.7300	Density/relative	The density of the product was reported to be 1.007 g/mL at 20°C. (see appendix 1)	Acceptable	50159201
830.7370	Dissociation constants in water	The product is not TGAI	Acceptable	50159201
830.7520	Particle size, fiber length & diameter distribution	No required. This product has a "Formulator Exemption Statement" EPA form 8570-27.	Acceptable	48841502
830.7550/ 7560/ 7570	Partition coefficient	Not required for MUP or EP	Not applicable	N/A
830.7840/ 7860	Water solubility	Not required for MUP or EP	Not applicable	N/A
830.7950	Vapor pressure	Not required for MUP or EP	Not applicable	N/A

Pages 42-50 Product ingredient source information may be entitled to confidential treatment

Heffernan, Aline

From: Powell, Wallace
Sent: Thursday, March 16, 2017 8:38 PM
To: Heffernan, Aline
Cc: Murasaki, Seiichi; Hicks, Karen
Subject: Technical Screen for DP 438077 - 92068-G

Hi Aline

The data package passes the screen and is ready to go into PSB review. Acute Tox

Wallace

Heffernan, Aline

From: Rodriguez, Salvador
Sent: Friday, February 24, 2017 9:49 AM
To: Hicks, Karen
Cc: Heffernan, Aline; Hebert, John
Subject: Technical screen status for EPARN: 92068-G (D438119) ::::::::::::::: !!!!!!!! P :::::::: A !!!!!!!!!! S :::::::: S !!!!!!!!!!

Salvador Rodriguez, chemist
US EPA / Antimicrobial Division / PSB / CTT - Product Chemistry
703-305-5329
Room S-8836
Mail Code 7510 P
2777 South Crystal Drive
Arlington, VA 22202

The product passed the chemistry technical Screen.

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 1-19-17

Experts In-Processing Signature: B.B. Date 2-3-17 Fee Paid: Yes ✓

Division management contacted on issues No_____ Yes_____ Date_____

EPA Reg. Number: 92068-G	EPA Receipt Date: 1-19-17

	Items for Review			Yes	No	N/A*
1	**Application Form** (EPA Form 8570-1) signed & complete including package type			X		
2	**Confidential Statement of Formula** all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All inerts, including fragrances, approved for the proposed uses (see Footnote A)	**yes**	**no**			
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent					
–	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	**yes**	**no**			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	**Formulator's Exemption Statement** (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
5	**Data Matrix** (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
	a) Selective Method (Fee category experts use)	**yes** X	**no**			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	**5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)**			X		
7	**Is the data package consistent with PR Notice 86-5**			X		
8	**Notice of Filing included with petitions**					X

9	**If applicable for conventional applications, <u>reduced risk rationale</u>**			
	<u>Required Data</u> and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

Comments:

Documentation: (Pass)
- Missing 8570-34/35, emailed agent contact 2/8. Received corrections 2/10. See email for more info
- Required forms are complete

Inerts: (Pass)
- Inerts approved for Non-Food Use

PRN 11-3: (Pass)
- MRID: 501592

Overall Status: (Pass)
SM 2/10/17

Mattingly, Sean

From: Matthew Brooks <mwbrooks01@yahoo.com>
Sent: Thursday, February 09, 2017 3:20 PM
To: Mattingly, Sean
Subject: Re: EPA Submission Miracle Titanium MVX (EPA Reg. No. 92068-G)
Attachments: scan of data matrix 92068G.pdf

Here you go
Added to page 1 and notes page.
-Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

On Thursday, February 9, 2017 11:45 AM, "Mattingly, Sean" <Mattingly.Sean@epa.gov> wrote:

Dear Matthew Brooks,

I apologize for the inconvenience, but upon further review there were two missing guidelines that I did not list in my previous email. They are: 830.6316 Explodability and 830.6321 Dielectric Breakdown Voltage.

Thank you,

Sean Mattingly

From: Matthew Brooks [mailto:mwbrooks01@yahoo.com]
Sent: Wednesday, February 08, 2017 1:22 PM
To: Mattingly, Sean <Mattingly.Sean@epa.gov>
Cc: Ashe, Anthony <Ashe.Anthony@epa.gov>
Subject: Re: EPA Submission Miracle Titanium MVX (EPA Reg. No. 92068-G)

Hi Sean
See attached. I used the wrong table of the CFR for the guideline numbers when I put this portion together. Corrections to the matrix are on page 2.
-Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

On Wednesday, February 8, 2017 12:22 PM, "Mattingly, Sean" <Mattingly.Sean@epa.gov> wrote:

Dear Matthew Brooks,
My name is Sean Mattingly and I am a contractor with the EPA. I am contacting you in regard to your submissions in support of the product Miracle Titanium MVX (EPA Reg. No. 92068-G). We have found a few deficiencies with the submissions that need to be addressed:

1. The following forms are missing from your submission:
    a. 8570-34: Certification with Respect to Citation of Data
2. The following guidelines were missing from 8570-35 Data Matrix:
    a. 830.1550: Product Identity and Composition

b. 830.1600: Description of Materials Used to Produce the Product
c. 830.1650: Description of Formulation Process
d. 830.1670: Discussion on the Formation of Impurities
e. 830.6314: Oxidation/Reduction (Chemical Incompatibility)

Please reply to this email with the necessary forms and revised studies in pdf file form by 02/15/2017. If you are unable to send the requested documentation by this date please send it to the appropriate PM. If you have any questions, please do not hesitate to contact me.

Sean Mattingly

Contractor, US EPA
2777 S. Crystral Drive, S-4822
Arlington, VA 22202
703-347-0501
Email: mattingly.sean@epa.gov

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

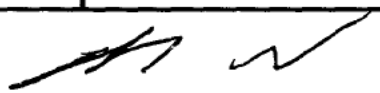
Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 2/8/2017	EPA Reg No./File Symbol 92068-G	Page 1 of 3
Applicant's/Registrant's Name & Address Miracle Titanium LLC c/o Ag-Chem Consulting, 12208 Quinque Lane, Clifton VA 20124	Product Miracle Titanium MVX	

Ingredient Silver (PC Code 72501)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6302	Color		Miracle Titanium LLC	Own	submitted
830.6303	Physical State		Miracle Titanium LLC	Own	submitted
830.6304	Odor		Miracle Titanium LLC	Own	submitted
830.6313	Stability				1
830.6315	Flammability				2
830.6316	Explodability				3
830.6317	Storage Stability		Miracle Titanium LLC	Own	In Progress
830.6319	Miscibility				1
830.6320	Corrosion Characteristics		Miracle Titanium LLC	Own	In Progress
830.6321	Dielectric Breakdown Voltage				4
830.7000	pH		Miracle Titanium LLC	Own	submitted
830.7050	UV / Visible				1
830.7100	Viscosity		Miracle Titanium LLC	Own	submitted
					1

Signature	Name and Title	Date
	Dr. Matthew Brooks, Regulatory Consultant	2/8/2017

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date 2/8/2017	EPA Reg No./File Symbol 92068-G	Page 2 of 3
Applicant's/Registrant's Name & Address Miracle Titanium LLC c/o Ag-Chem Consulting 12208 Quinque Lane, Clifton VA 20124	**Product** Miracle Titanium MVX	

Ingredient Silver (PC Code 72501)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7220	Boiling Range				1
830.7300	Bulk Density / Specific Gravity		Miracle Titanium LLC	Own	submitted
830.6314	Oxidation/Reduction		Miracle Titanium LLC	Own	submitted
830.7520	Particle Size / Distribution				NA for EUP
830.7550	Partition Coefficient				1
830.7840	Water Solubility				1
830.7950	Vapor Pressure				1
830.1620	Description of Production Process		Miracle Titanium LLC	Own	submitted
830.1670	Discussion of Impurities		Miracle Titanium LLC	Own	submitted
830.1700	Preliminary Analysis				1
830.1750	Certified Limits		Miracle Titanium LLC	Own	submitted
830.1800	Enforcement Analytical Method	49965201	Miracle Titanium LLC	Own	
830.1550	Product Identity and Composition		Miracle Titanium LLC	Own	submitted
830.1600	Description of Materials Used to Produce the Product		Miracle Titanium LLC	Own	submitted
830.1650	Description of Formulation Process		Miracle Titanium LLC	Own	submitted

Signature	Name and Title	Date
	Dr. Matthew Brooks, Regulatory Consultant	2/8/2017

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date 1/21/2017	EPA Reg No./File Symbol 92068-	Page 3 of 3
Applicant's/Registrant's Name & Address Miracle Titanium LLC c/o Ag-Chem Consulting, 12208 Quinque Lane Clifton VA 20124	Product Miracle Titanium MVX	

Ingredient Silver (PC Code 72501)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Toxicity -Rat	49965204	Miracle Titanium LLC	Own	
870.1200	Acute Dermal toxicity	49965207	Miracle Titanium LLC	Own	
870.1300	Acute Inhalation toxicity- Rat	49965208	Miracle Titanium LLC	Own	
870.2400	Primary Eye Irritation- Rabbit	49965206	Miracle Titanium LLC	Own	
870.2500	Primary dermal Irritation	49965205	Miracle Titanium LLC	Own	
870.2600	Dermal Sensitization	49965203	Miracle Titanium LLC	Own	
	Hypersensitivity Events				None

Signature	Name and Title	Date
	Dr. Matthew Brooks, Regulatory Consultant	1/21/2017

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

Notes:

1- Not applicable to an end use product.
2- Not Applicable, Product is predominantly water and not flammable.
3- Not Applicable, Product is greater than 95% water and is not explosive.
4- Not Applicable, Product is not be used around electrical equipment.

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.
Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number	EPA Registration Number/File Symbol
Miracle Titanium LLC c/o Ag-Chem Consulting 12208 Quinque Lane Clifton VA 20124	92068-G
Active Ingredient(s) and/or representative test compound(s) Silver	Date 2-8-2017
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Nonfood	Product Name Miracle Titanium MVX

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☑ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☑ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

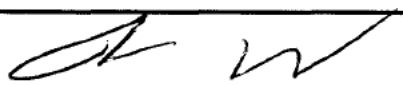
I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses .

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
	2-8-17	Matthew Brooks, Reg Agent

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

A540 - New end use product.

- Must submit or reference Group A and B product chemistry, toxicity, and/or efficacy data for each proposed product.
- Data waivers may be requested. Chemistry data on the TGAI in addition to the EP is required if an unregistered source is used.

End Use (EP) or Manufacturing Use (MP) product or Technical Grade of the Active Ingredient (TGAI)

Guideline No.	Group A: Product Chemistry Data Study Title	EP Data Submitted	MP Data Submitted	TGAI Data Submitted
830.1550	Product Identity & Composition	X		
830.1600	Description of materials used to produce the product	X		
830.1650	Description of formulation process	X		
830.1670	Discussion on the formation of impurities	X		
830.1700	Preliminary analysis	X		
830.1750	Certified limits (158.345)	X		
830.1800	Enforcement analytical method	X		

Guideline No.	Group B: Product Chemistry Data Study Title	EP Data Submitted	MP Data Submitted	TGAI Data Submitted
830.6302	Color	X		
830.6303	Physical State	X		
830.6304	Odor	X		
830.6313	Stability to normal and elevated temperatures metal and metal ions			
830.6314	Oxidation/Reduction (Chemical incompatibility)	X		
830.6315	Flammability	X		
830.6316	Explodability			
830.6317	Storage stability*	X		
830.6319	Miscibility	X		
830.6320	Corrosion Characteristics*	X		
830.6321	Dielectric Breakdown Voltage	X		
830.7000	pH	X		
830.7050	UV/ Visible Absorption			
830.7100	Viscosity	X		
830.7200	Melting Point			
830.7220	Boiling Point			
830.7300	Density	X		
830.7370	Dissociation Constant			
830.7550	Partition Coefficient			
830.7840	Water Solubility			
830.7950	Vapor Pressure			

Grayed out = data not required *May not be included with initial application

A540 – Acute Toxicity Requirements

New products must either:
1) supply the product specific acute toxicity 6 pack data (listed below),
2) provide a bridging rationale document or waiver request or,
3) use the cite all method of data compensation, if applicable. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline No.	Acute toxicity (6 pack) Study Title	Cite All	Selective	Waiver Request	Bridging Rational
830.1100	Acute Oral (LD50)		X		
830.1200	Acute Dermal (LD50)		X		
830.1300	Acute Inhalation (LC50)		X		
830.2400	Acute Eye Irritation		X		
830.2500	Acute Dermal Irritation		X		
830.2600	Dermal Sensitization		X		

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 2, 2017

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-525688
EPA File Symbol or Registration Number: 92068-G
Product Name: MIRACLE TITANIUM MVX
EPA Receipt Date: 19-Jan-2017
EPA Company Number: 92068
Company Name: MIRACLE TITANIUM LLC

MATTHEW BROOKS
AG-CHEM CONSULTING LLC.
AGENT FOR MIRACLE TITANIUM LLC
12208 QUINQUE LANE
CLIFTON , VA 20124-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: A540

NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-8154.

Sincerely,

Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service {997865`~

This package includes the following

- (•) New Registration
- ( ) Amendment

[x] Studies? [ ] Fee Waiver?

[ ] volpay % Reduction: ___

for Division

- (•) AD
- ( ) BPPD
- ( ) RD

Risk Mgr. ~~34~~ 33

Receipt No. S- 997865

EPA File Symbol/Reg. No. 92068-G

Pin-Punch Date: 1/19/2017

[ ] This item is NOT subject to FFS action.

Action Code:

Requested: A540

Granted: A540

Amount Due: $ _____

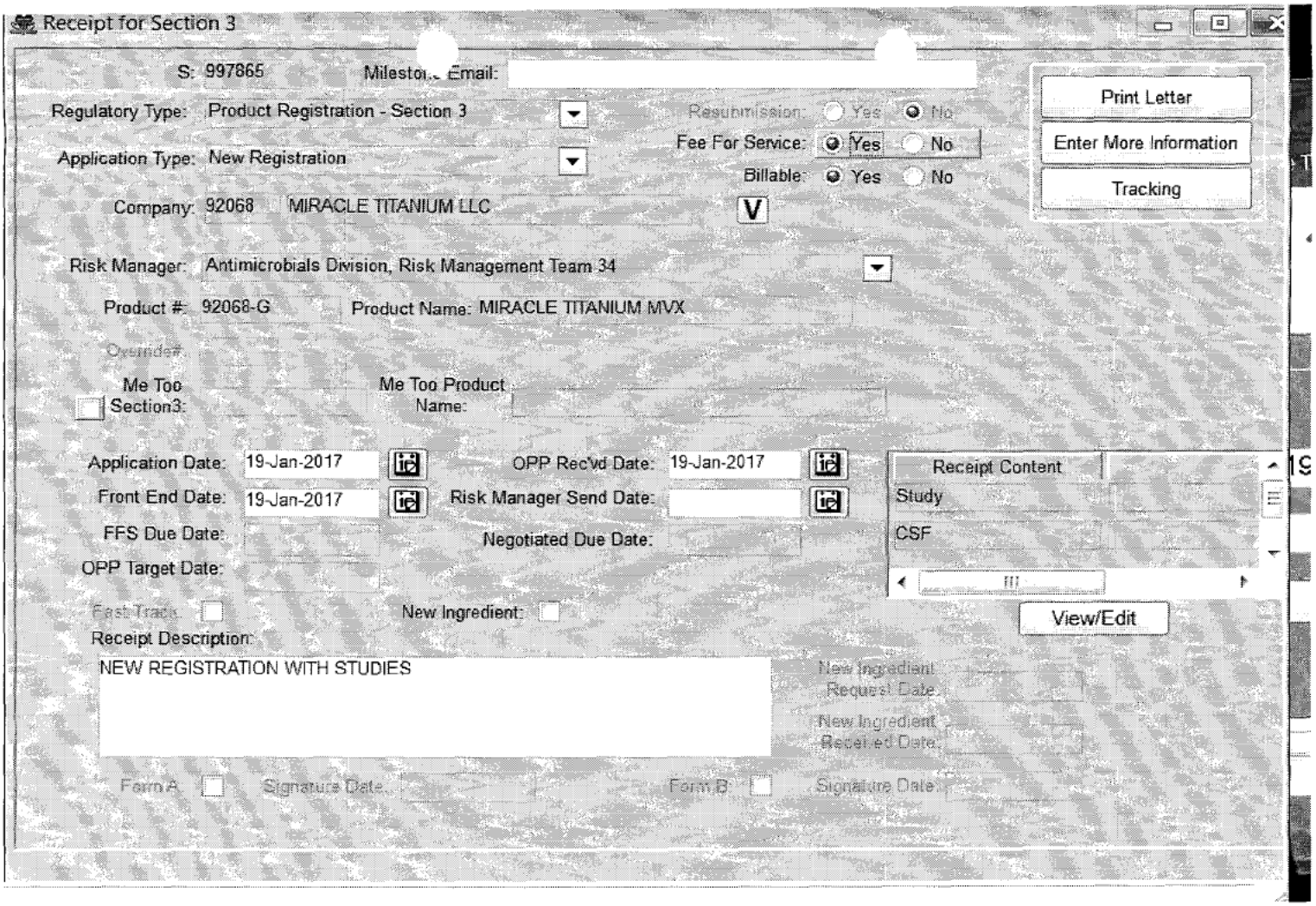
Parent/Child Decisions:

[■] Inert Cleared for Intended Use [■] Uncleared Inert in Product

Reviewer: E. Miederhoff Date: 1/23/17

Remarks:

* reference product has different a.i.?


Receipt for Section 3
S: 997865
Milesto... Email:
Regulatory Type: Product Registration - Section 3
Application Type: New Registration
Company: 92068 MIRACLE TITANIUM LLC
Resubmission: Yes No
Fee For Service: Yes No
Billable: Yes No
Print Letter
Enter More Information
Tracking
Risk Manager: Antimicrobials Division, Risk Management Team 34
Product #: 92068-G
Product Name: MIRACLE TITANIUM MVX
Override#:
Me Too Section3:
Me Too Product Name:
Application Date: 19-Jan-2017
Front End Date: 19-Jan-2017
FFS Due Date:
OPP Target Date:
OPP Rec'vd Date: 19-Jan-2017
Risk Manager Send Date:
Negotiated Due Date:
Receipt Content
Study
CSF
View/Edit
Fast Track:
New Ingredient:
Receipt Description:
NEW REGISTRATION WITH STUDIES
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form B:
Signature Date:

Pay.gov

Receipt

Your payment is complete

Pay.gov Tracking ID: 2605MTJC
Agency Tracking ID: 75167959970
Form Name: Pesticide Registration Improvement Act - Prepayment
Application Name: PRIA Service Fees

Payment Information

Payment Type: Debit or credit card
Payment Amount: $5,107.00
Transaction Date: 01/18/2017 11:02:26 AM EST
Payment Date: 01/18/2017
Registration Number:
Company Name: Miracle Titanium LLC
Company Number: 92068
Action Code: A540

Account Information

Cardholder Name: Matthew Brooks
Card Type: Visa
Card Number: **********1584

Email Confirmation Receipt

Confirmation Receipts have been emailed to:
mwbrooks@ag-chem.com

Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
(703) 266-4377 Fax

January 17, 2017

Document Processing Desk
Office of Pesticide Programs (7508C)
U.S Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington VA 22202

Attn: Julie Chao Product Manager 34

Re: Registration of Miracle Titanium MVX
EPA File Symbol 92068
Product Chemistry

Dear Ms. Chao;

On behalf of Miracle Titanium LLC, Ag-Chem Consulting LLC is hereby submitting the following Product Chemistry Data, formatted in accordance with Pesticide Registration notice 2011-3, in support of registration for the above product.

Guideline	MRID	Study Title
OPPTS Series 830 and 880	**50159201**	Miracle Titanium MVX, Product Chemistry. Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines Study # MVX100

Please feel free to contact me at 703-266-0128 if you have any questions concerning this submission.

Sincerely,

Matthew W. Brooks, Ph.D.
Ag-Chem Consulting LLC.
Authorized Representative of Miracle Titanium LLC

Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
(703) 266-4377 Fax

January 16, 2017

Office of Pesticide Programs
Document Processing Desk
Antimicrobial Division
U.S. Environmental Protection Agency
Room S-4900 Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202
ATTN: Julie Chao PM 34
Subject: Registration of new product
Company number 92068
Miracle Titanium MVX

Dear Ms. Chao:
Ag-Chem Consulting, on behalf of Miracle Titanium LLC, submits the following application for a new bacteriostatic product. The product is similar in uses to the currently registered product reg#73884-1, AfterShock Fungicidal Coating. Its proposed use pattern is indoor commercial walls such as offices, schools and hospitals. The product is designed to protect the walls from deterioration due to mold and mildew as well as prevent the growth of odor causing bacteria.

In support of this registration we are submitting:
An application;
Two copies of the CSF;
A complete data package of product chemistry
A Formulator's exemption form;
A completed Data Matrix
5 Copies of the Proposed Label
A letter of authorization from Miracle Titanium LLC for Ag-Chem Consulting

The active ingredient is silver in the form of silver zeolite. The source is registered [redacted] The active ingredient is trapped in a matrix formed by a new inert, peroxotitanic acid. This inert is currently in review for acceptability as a new nonfood inert and this review is expected to be completed by March 2017. The file symbol for this review is IN-10973.

[redacted]

Inert ingredient information may be entitled to confidential treatment

Manufacturing process information may be entitled to confidential treatment

We believe this should be PRIA coded A540, new end use product, which has a fee of $5, 107. A receipt is included.

I look forward to working with you on this registration.
If you have additional questions please feel free to contact me at 703-266-0128.
Sincerely,

Matthew Brooks, Ph.D.
Director, Ag-Chem Consulting
An Authorized Representative of Miracle Titanium LLC

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

☑ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
Miracle Titanium LLC/ 92068-	Julie Chao	☑ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Miracle Titanium LLC/ Miracle Titanium MVX	34	

5. Name and Address of Applicant *(Include ZIP Code)*

Miracle Titanium LLC c/o Ag-Chem Consulting
12644 Chapel Rd Clifton VA 20124

☐ *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in repsonse to Agency letter dated _____
☐ "Me Too" Application.
☑ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

New Product, registered source of active ingredient. Nonfood nonpublic health antimicrobial paint.
PRIA Code A540, new product FIFRA section 2 uses, $5, 107.00. Requires approval of new nonfood inert.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes ☑ No	☐ Yes ☑ No	☐ Yes ☑ No	☐ Metal ☑ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) _____
***Certification must be submitted**	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☑ Label ☐ Container	5, 55 and 250 gallon	☑ On drum

6. Manner in Which Label is Affixed to Product ☑ Lithograph ☐ Paper glued ☐ Stenciled ☐ Other _____

Section - IV

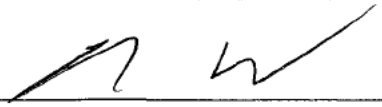
1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Dr. Matthew Brooks	Regulatory Consultant	703-266-0123

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received **(Stamped)**

2. Signature	3. Title
	Regulatory Consultant
4. Typed Name	**5. Date**
Matthew Brooks	1/21/2017

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

Miracle Titanium LLC

Miracle Titanium LLC
14241 Dallas parkway,
Suite 650
Dallas TX 75254
United States of America
☎ + 214 932 1002

December 15, 2015

To Office of Pesticide Programs

U.S. Environmental Protection Agency

One Potomac Yard

2777 S. Crystal Dr.

Arlington VA 22202

To Whom It May Concern,

Please may it be noted that Dr. Matthew Brooks and Ag-Chem Consulting are authorized to act on behalf of Miracle Titanium USA for federal and state regulatory matters relating to its pesticide products.

Yours Faithfully,

Mr Hassan S AlRafaey
CEO, Miracle Titanium LLC

Form Appro. . OMB No. 2070-0060. Approval Expires 5-31-98.

United States
Environmental Protection Agency
Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address	EPA File Symbol/Registration Number
Miracle Titanium LLC c/o Ag-Chem Consulting 12208 Quinque Lane Clifton VA 20124	92068-
	Product Name Miracle Titanium MVX
	Date of Confidential Statement of Formula *(EPA Form 8570-4)* January 21, 2017

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Silver

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula *(EPA FORM 8570-4)* for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Silver	[redacted]	[redacted]

Product ingredient source information may be entitled to confidential treatment

Signature	Name and Title	Date
[signature]	Dr. Matthew Brooks, Consultant	1-21-17

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 1/21/2017	EPA Reg No./File Symbol 92068-	Page 1 of 3
Applicant's/Registrant's Name & Address Miracle Titanium LLC c/o Ag-Chem Consulting, 12208 Quinque Lane, Clifton VA 20124	Product Miracle Titanium MVX	

Ingredient Silver (PC Code 72501)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6302	Color		Miracle Titanium LLC	Own	submitted
830.6303	Physical State		Miracle Titanium LLC	Own	submitted
830.6304	Odor		Miracle Titanium LLC	Own	submitted
830.6313	Stability				1
830.6315	Flammability				2
830.6317	Storage Stability		Miracle Titanium LLC	Own	In Progress
.6319	Miscibility				1
830.6320	Corrosion Characteristics		Miracle Titanium LLC	Own	In Progress
830.7000	pH		Miracle Titanium LLC	Own	submitted
830.7050	UV / Visible				1
830.7100	Viscosity		Miracle Titanium LLC	Own	submitted
					1

Signature	Name and Title	Date
	Dr. Matthew Brooks, Regulatory Consultant	1/21/17

Form Approved OMB No. 2070-0060

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401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date 1/21/2017	EPA Reg No./File Symbol 92068-	Page 2 of 3
Applicant's/Registrant's Name & Address Miracle Titanium LLC c/o Ag-Chem Consulting 12208 Quinque Lane, Clifton VA 20124	Product Miracle Titanium MVX	

Ingredient Silver (PC Code 72501)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7220	Boiling Range				1
830.7300	Bulk Density / Specific Gravity		Miracle Titanium LLC	Own	submitted
830.7520	Particle Size / Distribution				NA for EUP
830.7550	Partition Coefficient				1
830.7840	Water Solubility				1
830.7950	Vapor Pressure				1
880.1200	Description of Formulation Process		Miracle Titanium LLC	Own	submitted
J.1400	Discussion of Impurities		Miracle Titanium LLC	Own	submitted
830.1700	Preliminary Analysis				1
830.1750	Certified Limits		Miracle Titanium LLC	Own	submitted
830.1800	Enforcement Analytical Method	49965201	Miracle Titanium LLC	Own	
880.1200	Product Identity and Composition		Miracle Titanium LLC	Own	submitted
880.1100	Description of Materials Used to Produce the Product		Miracle Titanium LLC	Own	submitted
880.1200	Description of Production Process		Miracle Titanium LLC	Own	submitted

Signature	Name and Title	Date
	Dr. Matthew Brooks, Regulatory Consultant	1/21/2017

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date 1/21/2017	EPA Reg No./File Symbol 92068-	Page 3 of 3
Applicant's/Registrant's Name & Address Miracle Titanium LLC c/o Ag-Chem Consulting, 12208 Quinque Lane Clifton VA 20124	Product Miracle Titanium MVX	

Ingredient Silver (PC Code 72501)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Toxicity -Rat	49965204	Miracle Titanium LLC	Own	
870.1200	Acute Dermal toxicity	49965207	Miracle Titanium LLC	Own	
870.1300	Acute inhalation toxicity- Rat	49965208	Miracle Titanium LLC	Own	
870.2400	Primary Eye Irritation- Rabbit	49965206	Miracle Titanium LLC	Own	
870.2500	Primary dermal Irritation	49965205	Miracle Titanium LLC	Own	
870.2600	Dermal Sensitization	49965203	Miracle Titanium LLC	Own	
	Hypersensitivity Events				None

Signature	Name and Title	Date
	Dr. Matthew Brooks, Regulatory Consultant	1/21/2017

Notes:

1- Not applicable to an end use product.
2- Not Applicable, Product is predominantly water and not flammable.

Miracle Titanium MVX

A spray-on Preservative and Bacteriostatic Agent for commercial and residential uses

Active Ingredients:

Silver 0.10%
Other Ingredients.....99.90%
Total.....100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION PRECAUSION

PRECAUSION AL USARIO: Si usted no lee ingles, no use este product hasta que la etiqueta le haya sido explicada amplimente.

Manufactured by:
Miracle Titanium USA
218-2 Norimatsu Yahatanishi Ward
Kitakyashin City, Japan

EPA Registration No.:
EPA Establishment No.:

Net Content:

LOT No.:

FIRST AID	
IF on skin	• Take off contaminated clothing • Rinse skin immediately with gently of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF in eyes	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for further treatment advice.
IF inhaled	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
IF swallowed	• Call a poison control center or doctor immediately for treatment advice. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the Poison Control Center at 1-800-222-1222.	

PECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if inhaled or absorbed through skin. Causes moderate eye irritation. Avoid breathing dust. Avoid contact with skin, eyes, or clothing. Wear goggles or face shield and rubber gloves when handling . Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash clothing before reuse.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Miracle Titanium MVX is a spray on preservative and bacteriostatic agent which inhibits the growth of mold, mildew, fungus and bacteria that cause odor, discoloration, staining, deterioration or corrosion of the coated surfaces for at least 5 years. Miracle Titanium MVX also prevents biofilm accumulation on treated surfaces. It is a two part system consisting of a bacteriocidal spray and a non pesticidal sealer to hold the active ingredient on the surface and provide residual protections.

This product is for nonfood contact surfaces only:
Walls
Wallboard
Floors
Counters
Hospital surgical tables
Glazing for cement tile
Ventilation and air conditioning equipment
Upholstered furniture, mattresses and pillows
Carpets

Application Method

Spray Titanium MVX solution on surface and allow surface to air dry. Bacteria present will be killed within 10 minutes.
Residual bacteria will be reduced over 8 hours.

STORAGE AND DISPOSAL

Pesticide Storage: Keep container closed when not in use. Do not store near food or feed. Shake well before use. Protect from freezing. In case of spill or leak on floor or paved surfaces, soak up with sand, earth, or synthetic absorbent. Remove to chemical waste storage area until proper disposal can be made.

Pesticide Disposal: Pesticide wastes may be hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these waste cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 second after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Miracle Titanium USA or Seller. To the extent consistent with applicable law all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Miracle Titanium USA and Seller harmless for any claims relating to such factors.

Miracle Titanium USA warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal

use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Miracle Titanium USA, and Buyer and User assume the risk of any such use. To the extent consistent with applicable law Miracle Titanium USA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE. To the extent consistent with applicable law Miracle Titanium USA or seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF MIRACLE TITANIUM USA SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF MIRACLE TITANIUM USA OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Miracle Titanium USA and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and of Liability, which may not be modified except by written agreement signed by a duly authorized representative of Miracle Titanium USA.

Miracle Titanium USA
218-2 Norimatsu Yahatanishi Ward
Kitakyashin City, Japan

EPA Reg. No. xxxxx-x
EPA Est. No. XXXXX-XX-XXX

Pages 82-83 Confidential Statement of Formula may be entitled to confidential treatment